

WUSINICH, BROGAN & STANZIONE

Attorneys for Plaintiffs

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**THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

LEONIDES ROSARIO and GLENDALIZ
ROSARIO-TORRES, h/w

Plaintiffs,

vs.

SCM GROUP USA, INC.

Defendant.

CIVIL ACTION - LAW

No.: 02-3025

JURY TRIAL DEMANDED

LEONIDES ROSARIO and GLENDALIZ
ROSARIO-TORRES, h/w

Plaintiffs,

vs.

SCM GROUP SpA.
Rimini, Italy

Defendant.

CIVIL ACTION - LAW

No.: 03-761

JURY TRIAL DEMANDED

**PLAINTIFFS' MOTION FOR AN EXTENSION OF TIME
TO SUBMIT A SUPPLEMENTAL EXPERT REPORT**

Plaintiffs, by and through their counsel, Wusinich, Brogan & Stanzione, hereby bring this Motion to extend the discovery deadline for expert reports.

1. The expert report deadline is January 16, 2004.

2. Plaintiffs have submitted an expert report from all experts to Defendant by that deadline, including a liability report, a medical report, a vocational report, and an economist's report.

3. Plaintiff has recently begun work thus providing him with an earning capacity.

4. This has required the vocational expert and the economist to supplement their opinions.

5. The vocational supplemental report was completed two days ago.

6. The vocational supplemental report was immediately provided to Defendant and Plaintiffs' economist.

7. The economist indicates that he can supplement his report based on the vocational analysis in a short period of time.

8. Plaintiffs have called defense counsel Patricia Roy to ask for a reasonable extension of time (one (1) week) to submit the economist's report with no response.

9. Plaintiff seeks a one (1) week extension.

10. Plaintiffs have already submitted expert reports and the report in question is a supplement based on changed circumstances.

WHEREFORE, Plaintiffs respectfully request an extension of one (1) week to provide a supplemental expert report.

Respectfully submitted,
WUSINICH, BROGAN & STANZIONE

By: _____
Edward C. Sweeney
Attorney for Plaintiff

Dated: _____